

1 GREGORY P. GILMER, Bar No. 212067

2 greg.gilmer@kleinthomaslaw.com

3 KRISTYN WONG, Bar No. 346644

4 kristyn.wong@kleinthomaslaw.com

5 **KLEIN THOMAS LEE & FRESARD**

6 1920 Main St., Ste. 230

7 Irvine, California 92614

8 Tel: (949) 676-4570

9 *Attorneys for Defendant FCA US LLC*

10 Robert L. Starr, Bar No. 183052

11 robert@starrlaw.com

12 **THE LAW OFFICE OF ROBERT L. STARR**

13 23901 Calabasas Rd., Suite 2072

14 Calabasas, California 91302

15 Tel: (818) 225-9040 / Fax: (818) 225-9042

16 *Attorneys for Plaintiff Juvenal Rodriguez*

17 **UNITED STATES DISTRICT COURT**

18 **CENTRAL DISTRICT OF CALIFORNIA**

19 JUVENAL RODRIGUEZ, on behalf of
20 himself and others similarly situated,

21 Plaintiff,

22 vs.

23 FCA US, LLC,

24 Defendant.

CASE NO. 8:22-cv-01445-FWS-JDE

Assigned to Hon. Fred W. Slaughter

**NOTICE OF SETTLEMENT AND
STIPULATION TO TRANSFER
FOR SETTLEMENT PURPOSES**

1 Plaintiff Juvenal Rodriguez (“Plaintiff”) and Defendant FCA US, LLC
2 (“Defendant” or “FCA”) (collectively “the Parties”), through their respective
3 undersigned counsel, hereby notify the Court, pursuant to L.R. 40-2, that this matter
4 has settled.

5 Further, the Parties hereby request and stipulate, subject to Court approval, to
6 transfer this matter to the docket of Judge Fernando M. Olguin for the sole purpose
7 of preliminary and final settlement approval in conjunction with *Ebony Thompson v.*
8 *FCA, US LLC*, Case No. 2:21-cv-09815-FMO-MRW, a related action pending
9 before Judge Olguin, that is settling together with the *Rodriguez* action. The Parties
10 anticipate sending one settlement notice for both cases. A transfer for settlement
11 purposes will preserve judicial resources and allow one court to preside over the
12 joint settlement of both cases.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
14 subject to Court approval, that:

- 15 1. The above matter is transferred to Judge Olguin for settlement purposes
16 only and is deemed related to *Ebony Thompson v. FCA, US LLC*, Case No.
17 2:21-cv-09815-FMO-MRW.

18 Dated: November 14, 2024 **KLEIN THOMAS LEE & FRESARD**

19
20 By: /s/ Kristyn Wong

21 *Attorneys for Defendant FCA US LLC*

22 Dated: November 14, 2024 **POMERANTZ LLP**

23 By: /s/ Ari Y. Basser

24 Ari Y. Basser

25 Jordan L. Lurie

26 **FRONTIER LAW CENTER**

27 Manny Starr

28 Adam Rose

THE LAW OFFICE OF ROBERT L. STARR
Robert L. Starr

Attorneys for Plaintiff Juvenal Rodriguez

***I, Ari Y. Bassar, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2024, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

By: /s/ Ari Y. Basser